

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF VERMONT**

In re: Chapter 7
Hermitage Inn Real Estate Holding Company, LLC
Putative Debtor
Involuntary Case No.: 19-10214 (CAB)

**NOTICE OF JOINDER (i) IN SUPPORT OF MOTIONS SEEKING TRANSFER OF
VENUE OF PENDING CHAPTER 11 CASES FROM THE UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF CONNECTICUT TO THE DISTRICT
OF VERMONT, and (ii) IN OPPOSITION TO THE MOTIONS TO TRANSFER THE
PENDING CHAPTER 7 CASE FROM THE U.S. BANKRUPTCY COURT FOR THE
DISTRICT OF VERMONT TO THE DISTRICT OF CONNECTICUT**

Cold Brook Fire District No. 1 ("CBFD") by its attorneys, Pratt Vreeland Kennelly Martin & White, Ltd., hereby file its Notice of Joinder.

- (i) In Support of the Motions seeking transfer of venue of pending chapter 11 cases from the United States Bankruptcy Court for the District of Connecticut to the District of Vermont, filed by the Petitioning Creditors (Doc. No 28) and Barnstormer Summit Lift, LLC (Doc. No. 32); and
- (ii) In Opposition to the Motions to transfer the pending chapter 7 case from the U.S. Bankruptcy Court for the District of Vermont to the District of Connecticut, by Hermitage Inn Real Estate Holding Company, LLC ("HIRECH") (Doc. No. 46).

CBFD is a municipal entity and a party to executory contracts with HIRECHC concerning the provision of water and sewage disposal services. The Berkshire Bank has been paying the amounts due CBFD under the agreements with HIREHC that came due since the Bank filed the foreclosure action. CBFD's claims and liens are creatures of Vermont law and should be decided by a court familiar with that law.

For the reasons advanced in the by Barnstormer and the Petitioning Creditors in their Motions and the Opposition filed by Barnstormer to the Putative Debtor's transfer motion, the Chapter 11 cases pending in the District of Connecticut should, in the interest of justice and for the convenience of the parties, be transferred to the District of Vermont.

Accordingly, CBFD requests that the Motions of Barnstormer and the Petitioning Creditors to transfer the Chapter 11 cases pending in the District of Connecticut to the District of Vermont be granted and that the Putative Debtor's motion to transfer venue the District of Connecticut be denied.

DATED at Rutland, Vermont this 5th day of June, 2019.

Cold Brook Fire District No. 1
by its counsel,

By: /s/ John J. Kennelly

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